



LOLO M. MOLIGA
Governor

LEMANU P. MAUGA
Lt. Governor

AMERICAN SAMOA ENVIRONMENTAL PROTECTION AGENCY
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FA'AMAO O. ASALELE JR.
Acting Director

WILLIAM S. SILI
Acting Deputy Director

October 1, 2018

Pascal Mues
Environmental Engineer
NPDES Permits Office
US EPA Region 9, WTR-2-3
75 Hawthorne Street
San Francisco, CA 94105

Re: AS-EPA Recommendations for StarKist NPDES Permit

Dear Mr. Mues:

Please be advised that the American Samoa Environmental Protection Agency (AS-EPA) continues to reassess its position with regard to StarKist Samoa Company discharge of treated effluent as related to water quality data condition in Pago Pago harbor.

Re-evaluation of harbor water quality data based on increased frequency of monitoring events (approximately 6 events to date for calendar year 2018) shows that harbor water quality meets American Samoa Water Quality Standards for all parameters.

AS-EPA acknowledges that wastewater treatment system upgrades at the StarKist facility have had a positive effect on harbor water quality, and that the trend for improvement will continue as treatment system upgrades are finalized.

The water quality monitoring results for 2018 show that the "Revised Request for Water Quality Certification and Definition of Mixing Zones for the Joint Cannery Outfall" dated March 2017, and the Amendment submitted 19 June 2018, present a scientifically defensible position for mixing zones and effluent limits.

AS-EPA requests that US EPA NPDES Permit Office consider the accumulated 2018 harbor water quality data and prepare a Draft NPDES permit for public notice that adheres to the technical determinations of the March 2017 and June 2018 submissions.

Your consideration of the aforementioned recommendation is greatly appreciated. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Faamao O. Asalele Jr.', with a horizontal line drawn through the middle of the signature.

cc: David Smith, Manager - NPDES Permit Section, US EPA Region 9
Michael Wolfram, American Samoa Program Manager – US EPA Region 9
Iulogologo J. Pereira, Executive Assistant to the Governor